

GL-9 (Continued)

2

CITY OF
LONG BEACH

OFFSET INTERSECTIONS FOR WB OFFRAMP AND COLLEGE PARK DRIVE

Eliminate existing intersection of Ony/offramp and College Park Drive and construct a sound wall.
Connect both roadways to Studebaker Road with separate intersections.

GL-9 (Continued)

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RESPONSE TO GOVERNMENT (LOCAL) COMMENTS (GL)

Response to Comment Letter GL1

Comment GL1-1

Caltrans and OCTA thank the City of Fountain Valley for participating in the environmental process for the I-405 Improvement Project. The City's comment is not specific to the new information and analysis presented within the Supplemental Draft EIR/EIS; however, the City's comments were addressed in Appendix R1 (Draft EIR/EIS Response to Comments).

Please see Common Response – Impacts to Businesses, which includes a subsection with the heading Magnolia/Warner Interchange on the Southbound Side of I-405.

Comment GL1-2

Please see Common Response – Northbound Braided Ramps at the Magnolia/Warner Interchange.

Comment GL1-3

Please see Common Response – Preferred Alternative Identification.

Response to Comment Letter GL2

Comment GL2-1

Caltrans and OCTA thank the City of Long Beach for participating in the environmental process for the I-405 Improvement Project. The City's comments on new information and analysis presented within the Supplemental Draft EIR/EIS were considered during identification of the Preferred Alternative as described in the Final EIR/EIS. The City will be notified at the address provided in your comment when the Final EIR/EIS is available for review.

Please see Responses to Comments GL2-8 through GL2-15.

Comment GL2-2

Please see Responses to Comments GL2-16 through GL2-19.

Comment GL2-3

The comment period during public circulation of the Supplemental Draft EIR/EIS was identified as the most efficient means to obtain comments on, and reach consensus about, the feasibility of the proposed measures, their funding, and the agency to be responsible for each measure.

Measures T-10 and T-11 include the requirement for OCTA to conclude agreements with the City of Long Beach and Caltrans, respectively, regarding the fair share payments and improvements proposed in each measure. Further coordination among OCTA, Caltrans, the City of Long Beach, Metro, and Gateways COG is anticipated prior to conclusion of those agreements.

Comment GL2-4

Caltrans appreciates that the City of Long Beach has provided options for consideration as measures to address the cumulative adverse effects at some of the intersections along 7th Street in Long Beach. The options are more fully addressed in Response to Comment GL2-20.

Analysis of the proposed improvements at the intersection of College Park Drive and the SR-22 westbound ramps is presented in the Supplemental Draft EIR/EIS. The analysis shows that the queues would not back up onto the SR-22 westbound freeway. The following table presents the anticipated queues; the data are presented in the Supplemental Traffic Study Report – Long Beach Area in Appendices III A-1, III A-2, IV A-1, and IV A-2 for Alternative 1 year 2020, Alternative 1 year 2040, Alternative 2 year 2020, and Alternative 2 year 2040, respectively. The table shows that the 95th percentile queues anticipated approaching the intersection with the proposed signal would not exceed 240 ft during the peak hours in the years 2020 and 2040. The distance from the stop line for the proposed signal at the intersection of the ramp with College Park Drive to the gore point is approximately 850 ft.

Anticipated 95th Percentile Queues on the SR-22 Westbound Exit Ramp Approach to the Proposed Signal at College Park Drive			
		Alternative 1	Alternative 2
2020	AM	142	148
	PM	223	240
2040	AM	160	189
	PM	226	240

The improvements proposed at the intersection of 7th Street and Bellflower Boulevard in the Supplemental Draft EIR/EIS do not require any additional ROW, as shown in Figure 4-8 in Appendix B2 of the Supplemental Draft EIR/EIS.

Comment GL2-5

As noted in the comment, 7th Street currently operates at LOS F. A comparison of the volumes at intersections along 7th Street under the existing condition (Figure 3-5 of the Supplemental Draft EIR/EIS) with the forecast volumes for the 2040 No Build Alternative (Figure 3-18 of the

Supplemental Draft EIR/EIS) shows that traffic is anticipated to increase along 7th Street without the proposed I-405 project. Consequently, there is an adverse effect on 7th Street traffic without the project. The additional increment of traffic on 7th Street associated with the proposed project results in cumulative effects of traffic from the project and from other sources that are greater than those solely from the project alone. Consequently, the measures included in the Supplemental Draft EIR/EIS are not intended to address all of the deterioration in traffic service expected between the existing condition and year 2040.

Comment GL2-6

Since, as explained in Response to Comment GL2-5, the measures are not intended to address all traffic operations deterioration regardless of source, projects other than the I-405 Improvement Project and/or other funding sources will be required to obtain the balance of full funding for construction of the proposed improvement measures.

Comment GL2-7

The measures proposed in the Supplemental Draft EIR/EIS fully address adverse traffic effects within Long Beach. As noted in Response to Comment GL2-5, deterioration of traffic service at intersections identified as having significant cumulative project impacts is not solely attributable to the project. Consequently, implementation of the proposed improvements in Measures T-10 and T-11 are not solely the responsibility of the proposed project. Measures T-10 and T-11 include the requirement for OCTA to conclude agreements with the City of Long Beach and Caltrans, respectively, regarding the fair share payments and improvements proposed in each measure. Further coordination among OCTA, Caltrans, the City of Long Beach, Metro, and Gateways COG is anticipated prior to conclusion of those agreements.

Comment GL2-8

The Supplemental Traffic Study and the Supplemental Draft EIR/EIS cover more than ramp terminus intersections. A total of 36 intersections are included in the analysis, of which 14 are not ramp termini. Two intersections were studied on Palo Verde Avenue, and adverse effects were not found near the freeway, so it is unlikely that adverse effects would be found farther away from the freeway. Similarly, 5 intersections were evaluated on Studebaker Road and 1 on Atherton Street, with no finding of adverse effect. One intersection on Bellflower north of I-405 (at the I-405 ramps) was studied and found not to have adverse effects. These findings show that the definition of the study area was accurate for the determination of potential adverse effects of the project in Long Beach.

Comment GL2-9

While the OCTAM traffic demand forecasting model is focused on Orange County, the zone structure and detailed network of arterials in the Long Beach study area is fine grained because of its proximity to Orange County. Network improvements were incorporated into the model used for the forecasting in the Long Beach area. Socioeconomic data used in the forecasting process were the approved SCAG data. Use of a model other than the OCTAM model in the Long Beach area would create forecasting inconsistencies at the boundaries between the two models, as well as inconsistencies in forecasting methods. Given the fine-grained nature of the OCTAM model in the Long Beach study area, the need for consistency between the forecasts in the Orange County and Long Beach areas outweighs the problems associated with the use of different forecasting tools and methods associated with using different models for the two areas.

During preparation of the supplemental traffic study, a traffic volume comparison was conducted to compare traffic volumes generated by the OCTAM model and the Gateway Cities traffic model. The results showed that the OCTAM model results were consistent with the Gateway traffic model for both the freeway system and local roadway network, with minor differences compared to the total volumes projected for the roadway network within the study area that were well within acceptable validation error.

Comment GL2-10

While the City of Long Beach may require the use of the intersection capacity utilization (ICU) method to evaluate traffic for environmental documents for which it is the lead agency, the lead agency for the I-405 Improvement Project is Caltrans, whose standard practices were followed in the preparation of the traffic information and evaluation. Caltrans requires use of the Highway Capacity Manual (HCM) method in the preparation of traffic studies.

Comment GL2-11

Caltrans standard practice for the assessment of effects to traffic as adverse, or of impacts to traffic as significant, does not include prescribed quantitative methods. Caltrans practice is to consider the data available in the determination of whether effects rise to the level of being adverse or impacts to the level of significance. While many communities, such as the City of Long Beach, have prescribed quantitative methods for the determination of an adverse effect or significant impact to traffic, this is not the practice of Caltrans, which is the lead agency for the I-405 Improvement Project. Caltrans' approach avoids the potential for a prescribed quantitative method to fail to consider additional factors that may not be quantitative. The Caltrans approach allows consideration of the total evidence available and thereby provides a more complete approach to determination of significance of impacts. Environmental documents, including this

one, circulated by Caltrans undergo thorough peer reviews so that the judgment of no one professional is responsible for any of the findings or conclusions with respect to the significance of impacts. It should also be noted, that among the local jurisdictions along the project corridor, there are different quantitative methods used to determine the significance of impacts.

Comment GL2-12

The Supplemental Draft EIR/EIS addresses both CEQA and NEPA requirements. The terminology of “effects,” “measures,” and “adverse” are based on NEPA requirements. Chapter 4 of the Supplemental Draft EIR/EIS addresses CEQA and uses terminology such as “impact” and “significant” with which the commenter is familiar. For example, Table 4-1 in the CEQA chapter (Chapter 4) has columns labeled “Cumulative Significant Impact” and “Project Contribution to Significant Impact”; Section 4.2 in the CEQA chapter is titled “Mitigation Measures for Significant Impacts under CEQA”. Measures T-10 and T-11 are project commitments that will be implemented during the design phase of the project.

Comment GL2-13

As noted in Response to Comment GL2-9, the socioeconomic data used to generate trips are the approved SCAG data. Whether distribution and assignment of those trips to the traffic network under the no-build condition includes some “freeway by-pass” traffic is not related to an assessment of the extent to which the I-405 Improvement Project will add an additional increment of traffic to roadways in Long Beach such that those roadways suffer deterioration of traffic operations. The Supplemental Draft EIR/EIS concerns the traffic in Long Beach resulting from the proposed I-405 Improvement Project; it is not required to, nor does it, address “growth, even cumulative growth, [that] is in fact directly related to changes in travel demand on the Caltrans system...” The fair share percentages shown in the Supplemental Draft EIR/EIS reflect the forecast contribution of the I-405 Improvement Project to increases in traffic at their respective intersections.

Comment GL2-14

The use of other models to forecast traffic in the Long Beach area is addressed in Response to Comment GL2-9. Based on the forecasts, the fair share percentages shown in the Supplemental Draft EIR/EIS reflect the forecast contribution of the I-405 Improvement Project to increases in traffic at their respective intersections.

Comment GL2-15

See Response to Comments GL2-5 and GL2-6 for discussion of the fair share topic.

Comment GL2-16

The public was given the opportunity to comment on the Supplemental Draft EIR/EIS during the 45-day comment period from June 28 to August 12, 2013. Comments were received by letter, e-mail, and in person at the public hearing held on July 24, 2013, in Long Beach.

Comment GL2-17

The Supplemental Draft EIR/EIS uses terminology consistent with both NEPA and CEQA. See Response to Comment GL2-12. Implementation of the proposed improvement measures in Long Beach as separate projects is due to the fact that the I-405 Improvement Project is responsible for only an increment of the additional traffic expected at the intersections for which improvements are proposed, as explained in Response to Comment GL2-5.

Comment GL2-18

Circulation of the Supplemental Draft EIR/EIS was determined to be an effective means for receiving comments from the City of Long Beach, the Los Angeles County Metropolitan Transportation Authority, the Gateway Cities Council of Governments, and other parties on the proposed improvement measures on roadways in Long Beach. Measures T-10 and T-11 include the requirement for OCTA to conclude agreements with the City of Long Beach and Caltrans, respectively, regarding the fair share payments and improvements proposed in each measure. Further coordination among OCTA, Caltrans, the City of Long Beach, Metro, and Gateways COG is anticipated prior to conclusion of those agreements.

Comment GL2-19

Measures T-10 and T-11, described in the Supplemental Draft EIR/EIS, are the improvement measures proposed in Long Beach.

Comment GL2-20

Caltrans appreciates the effort the City of Long Beach expended to review and suggest improvements to the measures proposed in the Supplemental Draft EIR/EIS. Additionally, Caltrans appreciates the acceptance as feasible the improvements at the following locations:

- a. Los Coyotes Diagonal and Bellflower Boulevard
- b. 7th Street and West Campus Drive
- c. Willow Street and Bellflower Boulevard
- d. Willow Street and Los Coyotes Diagonal
- e. Willow Street and Woodruff Avenue

For the intersection of the SR-22 westbound on-/off-ramp and College Park Drive (intersection 2 in the comment), the City of Long Beach proposal to separate the SR-22 westbound ramps from College Park Drive requires substantially more work than is required to address the cumulative adverse effect of the I-405 Improvement Project on the intersection. Because Measure T-11 provides that the I-405 Improvement Project would make a fair share contribution for the improvements included in the measure, that fair share amount would be unaffected and could be used by Caltrans to implement either the improvement included in the Supplemental Draft EIR/EIS, the improvement suggested by the City of Long Beach, or any other improvement that addresses the cumulative adverse effect at the intersection.

For the intersection of 7th Street and Pacific Coast Highway (intersection 3 in the comment), the City of Long Beach proposal would require acquisition of ROW along the south side of 7th Street, including impacts to structures at the gas station in the southeast quadrant of the intersection. The improvements proposed in the Supplemental Draft EIR/EIS would not require any ROW. It would be difficult to justify the ROW acquisition identified in the comment.

For the intersection of 7th Street and Bellflower Boulevard (intersection 5 in the comment), the City of Long Beach proposal would eliminate a northbound through lane and provide dual eastbound and westbound left-turn lanes where single lanes exist currently. The City of Long Beach proposal would require acquisition of ROW along the south side of 7th Street. The improvements proposed in the Supplemental Draft EIR/EIS would require no ROW. It would be difficult to justify the ROW acquisition identified in the comment, because the measure proposed in the Supplemental Draft EIR/EIS does not require additional ROW and addresses the cumulative adverse effect.

For the intersection of 7th Street and East Campus Drive (intersection 9 in the comment), the City of Long Beach proposal would extend the eastbound left-turn lane. That is one of the elements included in Supplemental Draft EIR/EIS Measure T-11, which includes “maximizing eastbound and westbound left-turn pocket lengths.” However, by itself, extending the eastbound left-turn lane is insufficient improvement to address the cumulative adverse effect at the intersection. The additional improvements proposed in Measure T-11 are needed to address the cumulative adverse effect.

For the intersection of 7th Street and Channel Drive (intersection 10 in the comment), the City of Long Beach proposal would provide dual left-turn lanes in both the eastbound and westbound directions along 7th Street. This is more work than is required to address the cumulative adverse effect of the I-405 Improvement Project on the intersection, which can be addressed through provision of dual left-turn lanes in the westbound direction and restriping of the southbound

approach to provide dual exclusive left-turn lanes. Because Measure T-11 provides that the I-405 Improvement Project would make a fair share contribution for the improvements included in the measure, that fair share amount would be unaffected and could be used by Caltrans to implement either the improvement included in the Supplemental Draft EIR/EIS, the improvement suggested by the City of Long Beach, or any other improvement that addresses the cumulative adverse effect at the intersection.

Response to Comment Letter GL3

Comment GL3-1

Caltrans and OCTA thank the City of Los Alamitos for participating in the environmental process for the I-405 Improvement Project. The City's comments on new information and analysis presented within the Supplemental Draft EIR/EIS were considered during identification of the Preferred Alternative as described in the Final EIR/EIS. The City will be notified at the address provided in your comment when the Final EIR/EIS is available for review.

The limits of the I-405 Improvement Project are based on a lengthy project development process dating back to 2003 when the Major Investment Study for the corridor was started. Improvements to I-605 in Orange County have not been considered during any part of the process except as necessary to accommodate the transition of the Express Lanes in Alternative 3 to the HOV lanes along I-605 north of the I-405 interchange. The Willow/Katella interchange was evaluated in the Draft EIR/EIS for potential significant impacts of the proposed project, but none were found.

Comment GL3-2

OCTA is currently developing Measure M Extension Project M, which the Measure M 2020 Plan says would "Improve freeway access and arterial connection to I-605 at Katella Avenue, which serves the communities of Los Alamitos and Cypress." The Measure M 2020 Plan also says that "The I-605/Katella Avenue interchange project will include both freeway and arterial improvements that will reduce congestion, traffic queuing, and delay within the interchange area."

Comment GL3-3

The Spring/Cerritos interchange is not within the proposed project limits. See Response to Comment GL3-1 for a description of the history of the project limits. The Spring Street interchange was evaluated as part of the Supplemental Draft EIR/EIS for potential significant impacts of the proposed project, but none were found.

Comment GL3-4

If Los Alamitos and/or Katella Avenue in the city of Los Alamitos become detour routes during I-405 construction, an agreement will be required with the City. However, no ramp or bridge closures are anticipated for the I-405 Improvement Project in the area north of Bolsa Chica Road. Consequently, substantial traffic impacts in Los Alamitos are not deemed likely. The off-ramp from I-405 southbound to Bolsa Chica Road is anticipated to be closed from 10 to 30 days, as reported in the Draft EIR/EIS on page 3.1.4-25. The Bolsa Chica Road overcrossing will require replacement as part of the project. A detailed Traffic Management Plan will be prepared to cover the Bolsa Chica Road overcrossing replacement and ramp closure that may include use of Seal Beach Boulevard as an alternative route.

Comment GL3-5

Caltrans and OCTA cannot commit to implement, as part of the I-405 Improvement Project, improvements that are part of other projects.

Comment GL3-6

Responses to all comments received on the Supplemental Draft EIR/EIS will be provided in the Final EIR/EIS. You will be notified at the address provided in your comment when the Final EIR/EIS is available for review.

Response to Comment Letter GL4

Comment GL4-1

There has been substantial coordination with the City of Long Beach, which is a formal Participating Agency under NEPA. For more details on the extent of coordination with the City of Long Beach, see Common Response – Coordination between Caltrans Districts 7 and 12, OCTA, Los Angeles Metro, Gateway City Council of Governments, and the City of Long Beach.

Comment GL4-2

A fair share of the costs for the improvements proposed in the Supplemental Draft EIR/EIS under Measure T-11 would address cumulative significant impacts to traffic on SR-22 (7th Street), which is a State highway. This fair share would be contributed by the I-405 Improvement Project for the proposed improvements. The remainder of the funding would be the responsibility of the State, not the City of Long Beach.

A comparison of the volumes at intersections along 7th Street under the existing condition (Figure 3-5 of the Supplemental Draft EIR/EIS) with the forecast volumes for the 2040 No Build

Alternative (Figure 3-18 of the Supplemental Draft EIR/EIS) shows that traffic is anticipated to increase along 7th Street without the proposed I-405 Improvement Project. Consequently, there is an adverse effect on 7th Street traffic without the project. The additional increment of traffic on 7th Street associated with the proposed project results in cumulative effects of traffic from the project and from other sources that are greater than those solely from the project alone. Consequently, the measures included in the Supplemental Draft EIR/EIS are not intended to address all of the deterioration in traffic service expected between the existing condition and year 2040.

A fair share of the costs for the improvements proposed in the Supplemental Draft EIR/EIS under Measure T-10 would address cumulative significant impacts to traffic on streets owned by the City of Long Beach. The remainder of the funding at these locations would be the responsibility of the City of Long Beach.

Response to Comment Letter GL5

Comment GL5-1

Caltrans and OCTA thank the Rossmoor Community Services District for participating in the environmental process for the I-405 Improvement Project. Your comment is not specific to the new information and analysis presented within the Supplemental Draft EIR/EIS; however, your comments were addressed in Appendix R1 (Draft EIR/EIS Response to Comments). You will be notified at the address provided in your comment when the Final EIR/EIS is available for review.

The petition by Rossmoor residents is included as Comment PC-PET-1.

The YouTube video referenced in the comment has not been included or addressed. In the “General Information about This Document” behind the cover page, the Supplemental Draft EIR/EIS states: “If you have any comments regarding the information contained in this Supplemental Draft EIR/EIS, please attend the public hearing and/or send your written comments to Caltrans by August 12, 2013.” A YouTube video is not a written comment, nor can it be reproduced for inclusion in the Final EIR/EIS.

Response to Comment Letter GL6

Comment GL6-1

Caltrans and OCTA thank the Rossmoor Community Services District for participating in the environmental process for the I-405 Improvement Project. The City will be notified at the address provided in your comment when the Final EIR/EIS is available for review.

Comment GL6-2

Please see Appendix R1 Common Response – Preferred Alternative Identification.

Response to Comment Letter GL7

Comment GL7-1

Caltrans and OCTA thank the Rossmoor Community Services District for participating in the environmental process for the I-405 Improvement Project. The Rossmoor Community Services District will be notified at the address provided in your comment when the Final EIR/EIS is available for review. Pursuant to the provisions of the Moving Ahead for Progress in the 21st Century Act (MAP-21), for streamlining purposes, the recommended approach was to keep the public review period within the timeframe specified in the project schedule. Therefore, Caltrans respectfully declined your request to extend the public review period for the Supplemental Draft EIR/EIS for the I-405 Improvement Project.

Response to Comment Letter GL8

Comment GL8-1

Caltrans and OCTA thank the Rossmoor Community Services District for participating in the environmental process for the I-405 Improvement Project. The Rossmoor Community Services District will be notified at the address provided in your comment when the Final EIR/EIS is available for review.

Please see Appendix R1 Common Responses – Preferred Alternative Identification and Opposition to Tolling.

Response to Comment Letter GL9

Comment GL9-1

Caltrans and OCTA thank you for participating in the environmental process for the I-405 Improvement Project. Your comments on new information and analysis presented within the Supplemental Draft EIR/EIS were considered during identification of the Preferred Alternative as described in the Final EIR/EIS. You will be notified at the address provided in your comment when the Final EIR/EIS is available for review.

Please see Appendix R1 Responses to Comments GL14-1 through GL14-316 for responses to your comments on the Draft EIR/EIS.

Comment GL9-2

The *Supplemental Traffic Study Report – Long Beach Area*, dated June 2013, was made available with the Supplemental Draft EIR/EIS on the Caltrans project Web site (<http://www.dot.ca.gov/dist12/405/index.htm>) on June 28, 2013, and was available for download throughout the comment period.

Comment GL9-3

The Supplemental Traffic Study referenced in the document is the *Supplemental Traffic Study Report – Long Beach Area*, dated June 2013.

Comment GL9-4

The Supplemental Draft EIR/EIS was circulated with the *Supplemental Traffic Study Report – Long Beach Area*, dated June 2013. The latter document was used as a source document for the former document. Other earlier editions of the Supplemental Traffic Study were preliminary drafts; therefore, they were not circulated.

Comment GL9-5

The documents circulated in conformance with the NEPA and CEQA requirements are the Supplemental Draft EIR/EIS and the *Supplemental Traffic Study Report – Long Beach Area*, dated June 2013. Preliminary draft technical studies were not used in the preparation of the Supplemental Draft EIR/EIS; therefore, they were not circulated.

Comment GL9-6

See Response to Comment GL9-5.

Comment GL9-7

The Supplemental Draft EIR/EIS covered new information not previously reported in the Draft EIR/EIS related to traffic in Long Beach proximate to the proposed project. *Supplemental Traffic Study Report – Long Beach Area*, dated June 2013, was the source technical document for that new information. Information on the “entire mainline project, interchanges, and intersections” was previously published in the Draft EIR/EIS.

Comment GL9-8

See Response to Comment GL9-1.

Comment GL9-9

The purpose of the Supplemental Draft EIR/EIS was to present new information related to potential traffic impacts in Long Beach associated with the project. Topics related to the Locally Preferred Alternative (LPA), the RTP, and the FTIP are not the subject of the Supplemental Draft EIR/EIS; however, please see Draft EIR/EIS Appendix R1, Draft EIR/EIS Response to Comments, for responses to comments regarding these topics.

Comment GL9-10

The air quality analysis prepared for the project was presented as part of the Draft EIR/EIS. Topics related to air quality are not the subject of the Supplemental Draft EIR/EIS. The air quality analysis (see Section 3.2.6 of the Draft EIR/EIS) used the same source data as traffic speeds reported in the Traffic Study (Tables 2.4.10, 2.5.10, 2.6.10, and 2.7.10) and Draft EIR/EIS (Table 3.1.6-6). There is a range of speeds that occurs within the LOS F designation from a high of 53 mph to a low of zero mph, so speeds under LOS F conditions under different alternatives are not the same. The preliminary results of traffic analysis on I-110 following implementation of the Express Lanes on that freeway are not germane to or indicative of expectations on I-405 for two reasons. First, the results are preliminary for the period immediately following implementation of the Express Lanes and do not represent the conditions anticipated over the long term. Second, the project that implemented Express Lanes on I-110 did not add any additional lanes as is proposed under Alternative 3.

Comment GL9-11

The purpose of the Supplemental Draft EIR/EIS was to present new information related to potential traffic impacts in Long Beach associated with the project. Topics related to transit are not the subject of the Supplemental Draft EIR/EIS. The Draft EIR/EIS does not identify any impacts to public transportation as a result of the proposed project. Public transit vehicles would continue to be eligible to use the HOV lanes in Alternatives 1 and 2, as well as have free use of the Express Lanes in Alternative 3.

Comment GL9-12

The purpose of the Supplemental Draft EIR/EIS was to present new information related to potential traffic impacts in Long Beach associated with the project. Topics related to occupancy requirements in HOV lanes of Alternatives 1 and 2 and in Express Lanes of Alternative 3 are not the subject of the Supplemental Draft EIR/EIS. No change in the HOV occupancy requirement is proposed under Alternatives 1 and 2. Under Alternative 3, HOV3+ vehicles would not pay a toll

to use the Express Lanes, and HOVs with 2 occupants would pay a toll under the preliminary Express Lane operating policies summarized in the Draft EIR/EIS on page 2-18.

Based on the speed and travel time data presented in the Draft EIR/EIS in Tables 3.1.6-6 and 3.1.6-7, the addition of a GP lane in each direction under Alternative 3 will result in increased efficiency in the GP lanes. The addition of a second managed lane in each direction south of SR-22 will increase efficiency in the managed lanes. Current users of the GP lanes who remain in the GP lanes are anticipated to experience an improvement in efficiency. Current users of the HOV lanes who elect to use the Express Lanes will experience an improvement in efficiency. Current users of the HOV lanes who elect to use the GP lanes will experience a reduction in efficiency. Current users of the GP lanes who elect to use the Express Lanes will experience an increase in efficiency. Overall, the average user of I-405 within the project limits will experience greater efficiency under Alternative 3.

Comment GL9-13

Measures proposed in the Supplemental Draft EIR/EIS to address significant cumulative traffic impacts in Long Beach result in those impacts being less than significant. While transportation demand management (TDM), transit, and other measures could have been proposed, the measures proposed directly address the impacts at the site of the impacts. TDM, transit, and other options have a much wider geography and would not be measurably effective at addressing the site-specific significant cumulative traffic impacts in Long Beach.

Comment GL9-14

The purpose of the Supplemental Draft EIR/EIS was to present new information related to potential traffic impacts in Long Beach associated with the project. Topics related to project limits and lane drops of the project alternatives are not the subject of the Supplemental Draft EIR/EIS. The limits of the project impacts were expanded to the north and are presented in the Supplemental Draft EIR/EIS. Those limits extend to Lakewood Boulevard along I-405, to PCH along SR-22 (7th Street), and to Carson Street along I-605 and include all of the interchanges along those routes as well as intersections in the vicinity of those interchanges. The limits of the impacts to the south extend along SR-73 south of I-405 to Bear Street and along I-405 south of SR-73 to Bristol Street. Origin/destination information is inherent in the travel demand forecasting used to forecast future traffic demand. Traffic volumes continuing beyond the project limits in the north along I-405 and I-605, as well as in the south along I-405 and SR-73, clearly justify the need for the improvements proposed in all three of the build alternatives. See also Common Response – Opposition to Tolling.

Comment GL9-15

Measures T-10 and T-11 are fair share contributions to improvements identified in response to cumulative adverse effects. The improvements at the locations in Long Beach are not to be implemented as part of the I-405 Improvement Project but as separate projects by the City of Long Beach and Caltrans, as stated in each of the measures. The preparation of required environmental analyses, such as air quality, water quality, and noise, would be provided as part of development of the projects to be implemented by the City of Long Beach and Caltrans.

Comment GL9-16

Chapter 6 of the Supplemental Draft EIR/EIS and Appendix H of the Draft EIR/EIS provide a complete listing of referenced materials.

Comment GL9-17

The new information is clearly presented in the *Supplemental Traffic Study Report – Long Beach Area*, dated June 2013, and summarized in the Supplemental Draft EIR/EIS. The report prepared by Iteris is not part of the environmental document and is neither presented nor analyzed as part of the I-405 Improvement Project environmental process.

Comment GL9-18

Concepts A and B are not alternatives in the environmental process of the I-405 Improvement Project for which Caltrans is the lead agency. The Supplemental Draft EIR/EIS includes the three build alternatives that are part of the I-405 Improvement Project environmental process.

Comment GL9-19

Please see Common Response – Traffic Flow at the Orange County/Los Angeles County Line.

Comment GL9-20

Caltrans, the lead agency, determined the limits of the study area included in the *Supplemental Traffic Study Report – Long Beach Area*, dated June 2013. The Technical Working Group provided some technical suggestions on the area that were considered by Caltrans in determination of the limits. The findings of the *Supplemental Traffic Study Report – Long Beach Area*, dated June 2013, included in the Supplemental Draft EIR/EIS were prepared by a consultant and reviewed and approved by Caltrans, the lead agency, which is responsible for the findings.

Comment GL9-21

Based on comments received on the Draft EIR/EIS, there has been discussion regarding the potential elimination of the proposed braided ramps at the Warner Avenue and Magnolia Street interchanges. A decision regarding elimination of these ramps and replacement with at-grade ramps will be made as part of the Preferred Alternative identification.

Comment GL9-22

The information contained in the Supplemental Draft EIR/EIS is new information not included in the Draft EIR/EIS. The environmental impacts of the proposed project on the College Park East neighborhood of the City of Seal Beach are fully documented in the Draft EIR/EIS.

Comment GL9-23

All intersections potentially impacted by the proposed project were evaluated, and information regarding those impacts were presented in the Draft EIR/EIS. Construction detours have not been identified. Tentative detours related to long-term (up to 30 days) freeway ramp closures have been identified and are included in Appendix M of the Draft EIR/EIS. Measure T-1, included in the Draft EIR/EIS, states: “A Final TMP [Traffic Management Plan] will be prepared prior to project construction that identifies methods to avoid and minimize construction-related traffic and circulation effects and minimize impacts to pedestrian and bicycle access, including ADA [Americans with Disabilities Act]-compliant features as a result of the proposed project. During construction, the contractor shall implement the methods identified in the Final TMP.”

Comment GL9-24

The SCAG Express/HOT Lane Network is discussed in the Draft EIR/EIS on page 3.1.6-96, where it is noted that I-405 is identified as part of that network.

Comment GL9-25

The Draft EIR/EIS Section 3.1.6, Traffic and Transportation/Pedestrian and Bicycle Facilities, makes it clear that congestion will not be eliminated by any of the proposed alternatives. Tables 3.1.6-4, 3.1.6-5, 3.1.6-12, and 3.1.6-12 of the Draft EIR/EIS show that each of the proposed alternatives result in operational improvements on I-405 within the project limits when compared to the No Build Alternative and address the purpose of the project (as described in the Draft EIR/EIS on page 1-5) to reduce congestion, enhance operations, and increase mobility. Based on the amount of ROW and/or double-decking of roadway necessary to eliminate congestion in the I-405 corridor, no alternative that would eliminate congestion in the corridor is deemed feasible. Draft EIR/EIS Section 2.2.7, Alternatives Considered but Eliminated from Further

Consideration, describes (starting on page 2-37) alternatives considered that included horizontal widening and vertical expansion.

Comment GL9-26

The volumes associated with Alternatives 1, 2, and 3 at the intersection of the SR-22 westbound ramps and College Park Drive are different, as shown in the Supplemental Draft EIR/EIS in Figures 3-15 through 3-17, and 3-19 through 3-21. Because the volumes are different, the potential for effects is different. As shown in Tables 3-1 and 3-10 of the Supplemental Draft EIR/EIS, Alternatives 1 and 2 have a cumulative adverse effect at the intersection. Table 3-12 of the Supplemental Draft EIR/EIS shows that there is no cumulative adverse effect from Alternative 3.

Comment GL9-27

Figure 3-3 of the Supplemental Draft EIR/EIS shows the lane configuration of the intersection of the SR-22 westbound ramps and College Park Drive under the existing conditions in 2009, consistent with the CEQA definition of the existing condition. Analysis of 2020 and 2040 no-build conditions at this location assume the geometrics in place in 2013.

The City of Long Beach proposal to separate the SR-22 westbound ramps from College Park Drive requires substantially more work than is required to address the cumulative adverse effect of the I-405 Improvement Project on the intersection. The Supplemental Draft EIR/EIS includes evaluation of the improvements proposed to address the cumulative adverse effect of the I-405 Improvement Project at the intersection.

Comment GL9-28

The improvement proposed in the Supplemental Draft EIR/EIS at the intersection of the SR-22 westbound ramps and College Park Drive includes widening the off-ramp ramp, which was not included in the previous request by the City of Seal Beach. If Alternative 1 or 2 is identified as the Preferred Alternative, Measure T-11 requires a fair share payment by OCTA to Caltrans for the I-405 Improvement Project's contribution to cumulative adverse effects at the intersection of the SR-22 westbound ramps and College Park Drive. Because the adverse effects are cumulative, Measure T-11 provides, in addition to the fair share payment, that the improvements would be implemented by Caltrans. Caltrans could elect to implement a set of improvements other than those identified in Measure T-11, provided that the improvements implemented address the cumulative adverse effect at the intersection.

Analysis of the proposed improvements at the intersection of College Park Drive and the SR-22 westbound ramps is presented in the Supplemental Draft EIR/EIS. The analysis shows that the queues would not back up onto the SR-22 westbound freeway. The following table presents the anticipated queues; the data are presented in the *Supplemental Traffic Study Report – Long Beach Area*, dated June 2013, in Appendices III A-1, III A-2, IV A-1, and IV A-2 for Alternative 1 year 2020, Alternative 1 year 2040, Alternative 2 year 2020, and Alternative 2 year 2040, respectively. The table shows that the 95th percentile queues anticipated approaching the intersection with the proposed signal would not exceed 240 ft during the peak hours in the years 2020 and 2040. The distance from the stop line for the proposed signal at the intersection of the ramp with College Park Drive to the gore point is approximately 850 ft.

Anticipated 95 th Percentile Queues on the SR-22 Westbound Exit Ramp Approach to the Proposed Signal at College Park Drive			
		Alternative 1	Alternative 2
2020	AM	142	148
	PM	223	240
2040	AM	160	189
	PM	226	240

Comment GL9-29

The Supplemental Draft EIR/EIS provides information on I-405 north of the proposed project limits under existing and future conditions with and without the proposed project. This information is included in the text, as well as in Tables 3-6 and 3-7. The *Supplemental Traffic Study Report – Long Beach Area*, dated June 2013, contains extensive information on I-405 north of the proposed project limits in Tables 2-3 through 2-5, 3-5 through 3-10, 4-5 through 4-10, 4-13, 4-14, 5-5 through 5-10, 5-13, 5-14, 6-5 through 6-10, 6-13, and 6-14.

The Draft EIR/EIS provides information on I-405 south of the proposed project limits near I-605. This information is included in Tables 3.1.6-4, 3.1.6-5, 3.1.6-12, and 3.1.6-13. The Traffic Study contains extensive information covering I-405 from Bristol Street to I-605, including information focused on the area from Bolsa Chica Road/Valley View Street to Seal Beach Boulevard and from Seal Beach Boulevard to I-605 near the county line in Tables 2.3.1, 2.3.2, 2.4.1 through 2.4.7, 2.5.1 through 2.5.7, 2.6.1 through 2.6.7, and 2.7.1 through 2.7.7.

Comment GL9-30

This Supplemental Draft EIR/EIS provides new information on potential project-related traffic effects within Long Beach. The new information and analysis presented within the Supplemental

Draft EIR/EIS is based on the *Supplemental Traffic Study Report – Long Beach Area*, June 2013. The information and analysis within this Supplemental Draft EIR/EIS was not available during the circulation period for the Draft EIR/EIS. Neither the Supplemental Draft EIR/EIS nor the *Supplemental Traffic Study Report – Long Beach Area*, dated June 2013, address topics in Seal Beach. Responses to comments made by the City of Seal Beach will be addressed in the Final EIR/EIS.

Comment GL9-31

Details of proposed design exceptions are typically not provided in environmental documents, and they were not provided in the Draft EIR/EIS. Details of design exceptions are provided in the Draft Project Report, which is available from Caltrans.

Comment GL9-32

The Supplemental Draft EIR/EIS was circulated along with the *Supplemental Traffic Study Report – Long Beach Area*, dated June 2013. The latter document was used as a source document for the former document. Other earlier editions of the Supplemental Traffic Study were preliminary drafts; therefore, they were not circulated.

Comment GL9-33

See Response to Comments GL9-32 and GL9-29.

Comment GL9-34

Seal Beach is a Participating Agency under NEPA and a Responsible Agency under CEQA.

Comment GL9-35

The *Supplemental Traffic Study Report – Long Beach Area*, dated June 2013, was made available with the Supplemental Draft EIR/EIS on the Caltrans project Web site (<http://www.dot.ca.gov/dist12/405/index.htm>) on June 28, 2013, and was available for download throughout the comment period. A hardcopy of the Supplemental Draft EIR/EIS, along with a CD containing the Supplemental Draft EIR/EIS and *Supplemental Traffic Study Report – Long Beach Area*, dated June 2013, was hand delivered at the start of the circulation period to two city officials:

- Sean Crumby, Assistant City Manager and Director of the Department of Public Works
- Michael Ho, City Traffic Engineer

Additionally, CDs containing the Supplemental Draft EIR/EIS and *Supplemental Traffic Study Report – Long Beach Area*, dated June 2013, were hand delivered to the following officials of the City of Seal Beach:

- Michael Leavitt, Mayor
- Gary Miller, Mayor Pro Tem
- Ellery Deaton, City Councilmember
- Gordon Sharnks, City Councilmember
- David Sloan, City Councilmember
- Jill Ingram, City Manager

The CDs for the five members of the City Council were hand delivered to the City Clerk for distribution to the City Council Members.

Comment GL9-36

See Response to Comment GL9-35.

Comment GL9-37

See Response to Comments GL9-35 and GL9-32.

Comment GL9-38

See Response to Comment GL9-20.

Comment GL9-39

See Response to Comment GL9-20. The traffic-related and associated impacts in Seal Beach are accurate as reported in the Draft EIR/EIS. As noted in Response to Comment GL9-56, the purpose of the Technical Working Group was to address topics not in Seal Beach, but in Long Beach. Periodic meetings with representatives of the City of Seal Beach regarding the project have been held since 2009 to address topics in Seal Beach.

Comment GL9-40

See Response to Comment GL9-35. The documents circulated in conformance with the NEPA and CEQA requirements are the Supplemental Draft EIR/EIS and the *Supplemental Traffic Study Report – Long Beach Area*, dated June 2013. Preliminary draft technical studies were not used in the preparation of the Supplemental Draft EIR/EIS; therefore, they were not circulated.

Comment GL9-41

See Response to Comments GL9-20 and GL9-40.

Comment GL9-42

Please see Appendix R1 Responses to Comments GL14-1 through GL14-316 for responses to your comments on the Draft EIR/EIS. The request from the City of Long Beach resulted in the preparation of substantial new information not included in the Draft EIR/EIS, including the identification of cumulative adverse effects and cumulative significant impacts of the proposed project not included in the Draft EIR/EIS. None of the comments received from the City of Seal Beach has resulted in the identification of new information about adverse effects or significant impacts that is not already included in the Draft EIR/EIS.

Comment GL9-43

Baseline conditions considered in the Draft EIR/EIS have not changed. The baseline was 2009 in the Draft EIR/EIS and remains so. Improvements to the I-405 corridor in Orange County are included in the 2012 RTP and were also included in the 2008 RTP. Improvements in the corridor are also included in the FTIP. A set of tentative improvements are included in these documents for the corridor; however, that set of tentative improvements does not relieve the lead agency of the requirement to consider a full range of alternatives to address the transportation needs in the corridor.

Comment GL9-43a

HOV lane options were considered in the Draft EIR/EIS. As noted in the comment, dual HOV lanes are included in Alternative M2; this alternative was considered and rejected for many reasons, including the fact that it would result in underutilization of the HOV lanes. Alternative M8 also had dual HOV lanes; it was also considered and rejected in part because of underutilization of the HOV lanes. Alternative M11 also had dual HOV lanes and was rejected for many reasons. The above alternatives are described in the Draft EIR/EIS in Section 2.2.7, Alternatives Considered but Eliminated from Further Discussion. Additionally, Alternative 3 is an HOV alternative; as noted in the Draft EIR/EIS, HOVs meeting the occupancy requirement for use of the Express Lanes would not be required to pay a toll.

Comment GL9-43b

As noted in the comment, the Draft EIR/EIS acknowledges on pages 1-9 and 3.1.6-75 that the HOV lanes in the corridor are operating in a degraded condition. The HOV3+ policy option for addressing that degradation is not rejected in the Draft EIR/EIS. As noted in the comment by

inclusion of a quote from page 3.1.6-82 of the Draft EIR/EIS, an HOV 3+ policy was not considered for the project. Immediately following the quote, and missing from the quote included in the comment, the Draft EIR/EIS provides the reason an HOV 3+ policy was not considered: “An HOV3+ occupancy policy was not considered, and should not have been considered, because it is not reasonable to change the HOV occupancy policy solely for the 12 miles of I-405 from Euclid Street to I-605 along which Alternative 1 proposes improvements. HOV occupancy requirements could reasonably be adopted for a much larger geography covering the entire county or southern California region, but this I-405 project is much more limited.” Caltrans can implement an HOV3+ option independent of the proposed project at any time.

An HOV3+ policy is included as an element in the Express Lanes proposed in Alternative 3. Please see the Common Response – Opposition to Tolling for information on the expected low utilization of HOV lanes under an HOV3+ occupancy policy. The Common Response also indicates how the expected low utilization of the HOV lanes under an HOV 3+ requirement is complemented by the Express Lanes in Alternative 3.

Comment GL9-43c

A TSM/TDM alternative was included in the Draft EIR/EIS, as indicated in Section 2.2.3, Transportation System Management/Transportation Demand Management Alternative; in Section 2.2.7 of the Draft EIR/EIS, that alternative is deemed not to satisfy the purpose and need of the project. With respect to the potential of TSM/TDM measures to address corridor deficiencies without capacity improvements, a qualitative analysis was used to conclude that TSM/TDM, by itself, is not sufficient to significantly reduce congestion and that additional capacity would be needed. Traffic growth expected in the corridor is on the order of 30 to 35 percent, as noted on page 1-9 of the Draft EIR/EIS, which was qualitatively concluded to be beyond the potential of the TSM/TDM Alternative. TSM/TDM elements are included in each of the build alternatives, as indicated on page 2-17 of the Draft EIR/EIS.

Comment GL9-44

Section 2.2.7, Alternatives Considered but Eliminated from Further Consideration, of the Draft EIR/EIS identifies numerous alternatives with different modes of transit that were considered for the I-405 corridor. These alternatives included fixed guideway transit and bus rapid transit, as well as additional regular route service. For additional information on this topic, see Appendix R1 Common Response – Elimination of Light-Rail Transit and Bus Rapid Transit Alternatives.

Comment GL9-45

The proposed improvements in Long Beach would address the increment of additional traffic anticipated on specific facilities as a result of the proposed I-405 Improvement Project. The proposed improvements would not provide substantial additional roadway capacity beyond what is needed to address that additional increment of traffic. No land use, air quality, noise, or other indirect impacts are anticipated as a result of the proposed improvements in Long Beach.

With implementation of proposed traffic Measures T-10 and T-11 in Long Beach, all project contributions to adverse cumulative effects at all of these intersections would be minimized. As described in Measure T-10, improvements to Long Beach intersections shall be implemented by the City of Long Beach, with the City of Long Beach bearing responsibility for necessary clearances and permits. As described in Measure T-11, proposed improvements to Caltrans intersections shall be implemented by Caltrans, with Caltrans bearing responsibility for necessary clearances and permits. Therefore, the City of Long Beach and Caltrans would be responsible for identifying and addressing any potential environmental impacts of those measures. The improvements identified in Measures T-10 and T-11 would be implemented under separate and independent projects by the City of Long Beach and Caltrans. Each separate and independent project would be required to fulfill the appropriate requirements of NEPA and CEQA. See Response to Comment GL9-15.

Comment GL9-46

See Response to Comment GL9-45.

Comment GL9-47

Based on comments received on the Draft EIR/EIS, there has been discussion regarding the potential elimination of the proposed braided ramps at the Warner Avenue and Magnolia Street interchanges. A decision regarding elimination of these ramps and replacement with at-grade ramps will be made as part of the Preferred Alternative identification.

Based on comments received on the Draft EIR/EIS there has been discussion regarding the potential truncation of Alternative 3 near Euclid Street. A decision regarding truncation will be made as part of the Preferred Alternative identification.

Comment GL9-47a

The apparent inconsistency in study area between the Supplemental Draft EIR/EIS and the Supplemental Traffic Study is due to the fact that the Supplemental Traffic Study referenced in

the comment is a draft edition; the final edition of the Supplemental Traffic Study, dated June 2013, defines the same study area as referenced in the Supplemental Draft EIR/EIS.

Comment GL9-47b

The project study area referenced by the comment in the Draft EIR/EIS on page 3.1.1-2 is in Section 3.1.1, Land Use. That study area is confined to the area of primary potential impact to land use lying along the I-405 corridor where the project proposes to provide additional capacity. That area does not include the city of Long Beach.

Comment GL9-48

Many of the comments provided by the City of Seal Beach are not related to the Supplemental Draft EIR/EIS; however, all of the comments have received a response.

Comment GL9-48a

The intent of the sentence referenced in the comment on page 3-93 of the Supplemental Draft EIR/EIS is to indicate that with implementation of the fair share agreement and payment of related funding prior to construction, as described in proposed traffic measures T-10 and T-11, the project's contribution to adverse cumulative effects within the Supplemental Draft EIR/EIS study area at the affected locations would be minimized.

Comment GL9-48b

The comment refers to the fact that the Lead Agency, Caltrans, has not publicly disclosed its responses to comments received on the Draft EIR/EIS or provided an opportunity for the public to critique those responses as required under Section 21092.5(a) of CEQA. The referenced section of CEQA very clearly states: "At least 10 days prior to certifying an environmental impact report, the lead agency shall provide a written proposed response to a public agency on comments made by that agency which conform with the requirements of this division. Proposed responses shall conform with the legal standards established for responses to comments on draft environmental impact reports. Copies of responses or the environmental document in which they are contained ...may be used to meet the requirements imposed by this section." Responses to comments on both the Draft EIR/EIS and the Supplemental Draft EIR/EIS are included in this Final EIR/EIS and will be available for at least 10 days before certification of the Final EIR/EIS, as required.

Comment GL9-49

Identification of an LPA by the OCTA Board of Directors is a recommendation to Caltrans regarding the Preferred Alternative and does not require recirculation of the Draft EIR/EIS.

Similarly, identification of the Preferred Alternative does not require recirculation of the Draft EIR/EIS. Both will be reported in the Final EIR/EIS.

The need to prepare and circulate a Supplemental Draft EIR/EIS with new information related to traffic in Long Beach is explained in Response to Comment GL9-42.

Comment GL9-49a

Concepts A and B are not new alternatives. They were potential design options to Alternative 2 being considered by the OCTA Board of Directors as a result of comments received on the Draft EIR/EIS. Concept A would change management of the HOV lanes within the project limits to Express Lanes; Concept A was not found to be viable because: (1) the segments of single Express Lanes in each direction would have limited ability to pass, (2) the limited ability to pass would not allow achievement of desired maximum volumes in the Express Lanes, and (3) the revenue potential did not cover the costs of implementation of the Express Lanes. Concept B and the reasons for its rejection as a viable design option are described in the Common Response – Almond Avenue Soundwall. The Supplemental Draft EIR/EIS was limited to addressing comments received on the Draft EIR/EIS with respect to potential traffic impacts in Los Angeles County and the city of Long Beach that were not addressed in the Draft EIR/EIS.

Comment GL9-49b

The logical termini discussion presented in the Draft EIR/EIS on page 1-23 is unaffected by the conclusions of the Supplemental Draft EIR/EIS. The logical termini discussion is limited to a discussion of the termini of the improvements on I-405. Those limits are not changed in any way by the conclusions of the Supplemental Draft EIR/EIS. The conclusions of the Supplemental Draft EIR/EIS indicated the need for some improvements to minimize significant cumulative impacts to other roadways.

Comment GL9-50

Mr. Beil's letter of June 25, 2013, referenced in the comment, appears to be a status report to the City of Seal Beach regarding OCTA's efforts to resolve the City's comments on the impacts of the proposed project presented in the Draft EIR/EIS to Almond Avenue and the Almond Avenue soundwall. Caltrans, the lead agency, has made no final decisions on any design changes or nonstandard features related to Almond Avenue and the soundwall and will not make any decisions until a Preferred Alternative is identified. Decisions on design changes will only be made by Caltrans for the alternative to be constructed, not for alternatives to be eliminated.

Comment GL9-50a

The roles and responsibilities of the two agencies, Caltrans and OCTA, are specified on page 1-1 of the Draft EIR/EIS. Caltrans is identified as the Lead Agency for both CEQA and NEPA. OCTA is identified as the project sponsor.

Comment GL9-50b

The entire Draft EIR/EIS, including Appendices and Technical Studies, was available on Caltrans' Web site at <http://www.dot.ca.gov/dist12/405/indexDRAFT.htm> during the comment period and remained available as late as March 1, 2014. A link on that page connects to <http://www.dot.ca.gov/dist12/405/index.htm> where the Supplemental Draft EIR/EIS and Supplemental Traffic Study Report, Long Beach Area were provided. That link also remained available as late as March 1, 2014.

With respect to the consultants preparing the Draft EIR/EIS and the Supplemental Draft EIR/EIS being under contract to OCTA rather than Caltrans, it is not at all unusual for project sponsors to contract for the preparation of an environmental document for a Lead Agency. Private developers frequently do this for land development projects, and funding agencies frequently do this for transportation improvement projects.

Comment GL9-51

Tolling authority is still required from the State legislature and from the Federal Highway Administration (FHWA) to operate toll lanes on I-405. MAP-21 removed the requirement for a tolling agreement between FHWA and Caltrans, but it did not remove the necessity to obtain tolling authority. The statements made regarding toll authority in Draft EIR/EIS Section 1.2.2.4 have not changed as a result of the passage of MAP-21.

Comment GL9-52

See Response to Comment GL9-29.

Comment GL9-53

Caltrans, the lead agency, has made no final decisions on any design changes or nonstandard features related to Almond Avenue and the soundwall and will not make any decisions until a Preferred Alternative is identified. Similarly, Caltrans has made no final decisions on nonstandard 11-ft-wide lanes or other nonstandard features on the southbound side of the freeway along the Naval Weapons Station Seal Beach. Decisions on design changes and nonstandard features will only be made by Caltrans for the alternative to be constructed, not for alternatives to be eliminated. Consideration will be given to nonstandard features along both the

northbound and southbound side of the freeway as necessary; because conditions on the two sides of the freeway are not the same, outcomes of consideration for nonstandard features may not be the same.

Comment GL9-54

Section 2 of the Supplemental Draft EIR/EIS is intended to provide a summary of the alternatives. A full discussion of the alternatives is presented in the Draft EIR/EIS. The TSM/TDM Alternative is included in the Draft EIR/EIS in Section 2.2.7, Alternatives Considered but Eliminated from Further Discussion. Additionally, TSM and TDM components are included in each of the build alternatives, as summarized in Section 2.2.1, Common Design Features of the Build Alternatives of the Draft EIR/EIS.

Comment GL9-55

The effects and impacts of the proposed project to traffic in Long Beach are the sole focus of the Supplemental Draft EIR/EIS. Those effects and impacts are summarized in the text of Chapters 3 and 4 and presented in detail in the tables included in those chapters. More extensive data are presented in the *Supplemental Traffic Study Report – Long Beach Area*, dated June 2013. After identification of cumulative adverse effects and cumulative significant impacts in Long Beach, measures to address them are also presented in the Supplemental Draft EIR/EIS.

Comment GL9-56

The Technical Working Group was formed to more fully understand the concerns raised by the City of Long Beach, Gateway Cities COG, and Metro that the Draft EIR/EIS failed to assess potential impacts of the project in the City of Long Beach and Los Angeles County and how those concerns could best be addressed. The Supplemental Draft EIR/EIS states on page S-1: “As a result of comments received during circulation of the Draft EIR/EIS on project-related traffic effects within the City of Long Beach, and new information, analysis, and project effects in the Supplemental Traffic Study, Caltrans, as the Lead Agency, made the decision to disclose this new information to the public by preparing and circulating this Supplemental Draft EIR/EIS.”

Similar meetings were held with the cities in Orange County, including the City of Seal Beach, starting in 2009 to more fully understand their concerns about the project and how those concerns could be addressed in preparation of the Draft EIR/EIS.

Comment GL9-57

See Response to Comments GL9-56 and GL9-20.

Comment GL9-58

No comments on the Supplemental Draft EIR/EIS were received from the California Air Resources Board (CARB). Comments were received from the SCAQMD and are presented as Comment Letter GR2.

Comment GL9-59

None of the comments received from the City of Seal Beach or any other commenter are considered by Caltrans to be trivial, insignificant, and/or unsubstantial. Caltrans treats all comments as important expressions of interest and concern in improving the proposed project.

The request from the City of Long Beach resulted in the preparation of substantial new information not included in the Draft EIR/EIS, including the identification of cumulative adverse effects and cumulative significant impacts of the proposed project not included in the Draft EIR/EIS. None of the comments received from the City of Seal Beach has resulted in the identification of new information about adverse effects or significant impacts that is not already included in the Draft EIR/EIS.

Please see Appendix R1 Responses to Comments GL14-1 through GL14-316 for responses to your comments on the Draft EIR/EIS.

Comment GL9-60

The purpose of the Supplemental Draft EIR/EIS was to determine if there were potential adverse effects or significant impacts of the proposed project on traffic in Long Beach and Los Angeles County. A geographic area was required in which to make that determination, which expanded the total traffic study area beyond the traffic study area that was included in the Draft EIR/EIS; however, the limits of the improvements proposed on I-405 have not changed, nor has the fact that the proposed termini are logical as presented in the Draft EIR/EIS on page 1-23.

Comment GL9-61

See Response to Comments GL9-42 and GL9-48.

Comment GL9-62

See Response to Comment GL9-35. The information contained in the Supplemental Draft EIR/EIS accurately summarizes the information presented in the *Supplemental Traffic Study Report – Long Beach Area*, dated June 2013.

Comment GL9-63

The December 2012 Supplemental Traffic Study, referenced in the comment, was a draft that was not released for public review and that has been superseded by the *Supplemental Traffic Study Report – Long Beach Area*, dated June 2013.

The Draft EIR/EIS discloses traffic operations information on I-405 south of the proposed project limits near I-605. This information is included in Tables 3.1.6-4, 3.1.6-5, 3.1.6-12, and 3.1.6-13. The Traffic Study discloses extensive information covering I-405 from Bristol Street to I-605, including information focused on the area from Bolsa Chica Road/Valley View Street to Seal Beach Boulevard and from Seal Beach Boulevard to I-605 near the County Line, in Tables 2.3.1, 2.3.2, 2.4.1 through 2.4.7, 2.5.1 through 2.5.7, 2.6.1 through 2.6.7, and 2.7.1 through 2.7.7. Please also see Appendix R1 Common Response – Traffic Flow at the Orange County/Los Angeles County Line, which provides a summary of the information contained in the tables noted above for the area near the Los Angeles county line.

Please also see Response to Comment GL9-65.

Comment GL9-64

Caltrans standard practice for the assessment of effects to traffic as adverse, or of impacts to traffic as significant, does not include prescribed quantitative methods. Caltrans practice is to consider all of the available data in the determination of whether effects rise to the level of being adverse or impacts to the level of significance. While many communities, such as the City of Long Beach, have prescribed quantitative methods for the determination of an adverse effect or significant impact to traffic, this is not the practice of Caltrans, which is the lead agency for the I-405 Improvement Project.

Comment GL9-65

See Responses to Comments GL9-62 and GL9-64.

Comment GL9-66

The adverse effects to traffic in Long Beach are cumulative effects, meaning that they only partly result from the proposed project. The cumulative adverse effects to traffic are from both the proposed project and from other sources; that is, the cumulative adverse effects are greater than those solely from the project alone. Consequently, the measures included in the Supplemental Draft EIR/EIS are not intended to address all of the deterioration in traffic service expected between the existing condition and year 2040, but only the increment of deterioration attributable to the project. Because the measures are not intended to address all traffic operations

deterioration regardless of source, projects other than the I-405 Improvement Project and/or other funding sources will be required to obtain the balance of full funding for construction of the proposed improvement measures.

Comment GL9-67

The apparent inconsistency between the two paragraphs of the Supplemental Draft EIR/EIS cited in the comment will be addressed in the Final EIR/EIS. The implementation of the fair share agreement addresses the project's cumulative impacts as stated in the second paragraph cited in the comment. The first paragraph cited in the comment provides for the contingency that the parties to the agreements specified in Measures T-10 and T-11 other than OCTA fail to find the balance of the funding necessary to implement the improvements identified in those measures. In that case, the first paragraph cited in the comment makes it clear that the cumulative impacts could not be addressed and that Findings and a Statement of Overriding Considerations would be included in the Final EIR/EIS documenting why those cumulative impacts could not be addressed.

The reference to 90 days after the publication of the ROD in the second paragraph cited in the comment will not appear in the Final EIR/EIS. Agreements will be reached or a Statement of Overriding Considerations prepared prior to completion of the Final EIR/EIS.